

## REMARKS

Claims 16-22, 38-44, 60-66 and 82-88 are pending in the application. Claims 16-18, 21-22, 38-40, 43-44, 60-62, 65-66, 82-84, and 87-88 are amended, no claims are cancelled, and no claims are added.

### I. ISSUES NOT RELATING TO PRIOR ART – SECTION 112

Claims 18, 40, 62, and 84 stand rejected as allegedly indefinite. Claims 18, 40, 62, and 84 as amended recite, “*the MIB object specification information,*” and thus the rejection is overcome. Reconsideration is respectfully requested.

### II. ISSUES RELATING TO PRIOR ART – SECTION 103

#### A. CLAIMS 16, 18, 19, 21, 22, 38, 40, 41, 43, 44, 60, 62, 63, 65, 66, 82, 84, 85, 87 and 88 – *GORINGE AND KOSS*

Claims 16, 18, 19, 21, 22, 38, 40, 41, 43, 44, 60, 62, 63, 65, 66, 82, 84, 85, 87 and 88 stand rejected under 35 U.S.C. § 103(a) as unpatentable over “*Goringe*” (US Pub. No. 2003/0131096) in view of “*Koss*” (US Pub. No. 2004/0030922). The rejection is respectfully traversed.

Claim 16 recites a managed device receiving a request to determine whether any of **multiple proposals** for correct values for a MIB object are correct. In response to the request, the managed device sends a message that indicates **whether or not any** of the proposed values is correct, but the message does not contain the values of the correct proposals.

*Goringe* describes a discovery agent that uses various techniques to discover a set of community strings to be used for requesting services from network devices. Once discovered, the agent attempts to validate the discovered community strings. The focus of *Goringe*'s technique is how to **discover** which community strings to validate, **and not on the validation** process. Thus, information about a validation request, such as how many community strings are sent to be validated in one validation request and the information contained in the reply, is not disclosed.

*Koss* describes a system in which a client authenticates to a server that maintains a list of community strings for network devices. Details of how the client authenticates to the server are not disclosed. Once authenticated, the client may request to receive a community string for a particular network device. Upon receipt of the requested community string, the client can then use the community string to request services from the network device.

#### **Claim 16**

Claim 16, recites in part,

*“completing execution of the SNMP GET request...without providing the correct value in response to the SNMP GET request.”*

Neither *Goringe*, nor *Koss*, alone or in combination teaches or suggests the quoted feature.

As mentioned above, *Goringe* does not describe the validation process. *Goringe* states in paragraph [0038],

*“When a corresponding credential exists, the agent in step 244 tests the validity of the credential by known techniques. The techniques, of course, depend upon the protocol being used by the network component corresponding to the IP address.”*

*Goringe* is silent regarding whether or not the correct value is provided in response to a validity check.

The Office Action relies on *Goringe*, page 2, paragraph [0023] to allegedly teach the quoted feature. This is incorrect. There is no mention of a request in the cited passage, much less any suggestion of responding to a request without providing the correct value. Aside from an implicit request for a validity test, about which no information is disclosed, the only mention of requests anywhere in *Goringe* are the following: a user requesting to stop the discovery process, a user requesting IP addresses to skip, and an ICMP (“ping”) request to diagnose a failed validation. *Goringe* fails to teach or suggest responding to any of these requests without providing the correct value.

*Koss* does not, nor is it alleged to, remedy the deficiencies in *Goringe* with respect to the quoted feature. *Koss* describes a community string server receiving a request from an authenticated client and the server **providing the correct community string**. *Koss* teaches **away** from this feature of Claim 16 that recites providing a response indicating whether any proposed value matches a correct value but **without providing** the actual **matching values(s)**. Thus, both *Goringe* and *Koss* fail to provide the quoted feature.

Claim 16 further recites:

*“a SNMP GET request identifying an SNMP MIB object and also containing a plurality of non-null values comprising proposals for a correct value of the SNMP MIB object”*

Neither *Goringe* nor *Koss*, individually or in combination, teaches or suggests the quoted feature. There is no request mentioned in either *Goringe* or *Koss* that contains a plurality of values comprising multiple proposals for a correct value of any object. The Office Action relies on the Abstract, Step 248, and page 3 paragraph [0040] of *Goringe* to allegedly teach this feature. Step 248 and the description of Step 248 in paragraph [0040] do not mention a plurality of proposals for a correct value of an object. Furthermore, although the abstract states, “*determining one or*

*more credentials of a network device,”* paragraphs [0038] and [0039] suggest that the validity testing of a credential with respect to an IP address is done one credential at a time. Thus, even if there are multiple credentials to test for a single IP address, each validation request contains a single value, not a plurality of values as claimed.

In addition, Claim 16 recites:

*“transmitting a notification message **indicating whether any of the plurality of values matches the correct value of the SNMP MIB object**”*

Neither *Goringe* nor *Koss* individually or in combination teach or suggest this quoted feature.

The Office Action acknowledges that *Goringe* does not teach this feature, and relies on *Koss*. *Koss* does not describe the authentication process by which the client authenticates to the server. There is no teaching or suggestion that this authentication process includes the community string server (managed device) receiving a plurality of authentication values (proposals for correct SNMP MIB values) and responding with an indication of whether any of the authentication values is correct, as claimed.

The Office Action relies on *Koss* paragraph [0017] on page 2, and paragraph [0018] on page 3 to allegedly teach the quoted feature. Paragraph [0017] states in part:

*“a transmission to server 26, from client application 20 of **authentication information (20a) and a return confirmation of the correctness thereof.**”*

The quoted passage not only fails to teach an indication of whether any of a plurality of values matches the correct value, but the passage suggests that the authentication information is just one value which is either correct or not. Paragraph [0018] states:

*“Following authentication, client application 20 requests from server 26 the appropriate community string password for MFP device 16...44 in FIG. 3 represents **a reply from server 26 which furnishes to client application 20 the requested SNMP community string.**”*

The Office Action directs attention to “...reply...,” within the cited passage. It appears that the Office Action considers *Koss*’ reply described in paragraph [0018] to be equivalent to the claimed notification message. The reply described in paragraph [0018] is the reply in response to an authenticated client’s request to obtain a valid community string for a particular managed device. *Koss*’ client request for a community string does not include a plurality of proposed values, and there is no suggestion that the response to the request indicates whether one of the values supplied by the client matches a correct value. Thus, both *Goringe* and *Koss* fail to provide the quoted feature.

Applicant has identified several distinguishing features of Claim 16 not found in any combination of *Goringe* and *Koss*. For at least these reasons, Claim 16 is patentable under 35 U.S.C. § 103(a) over *Goringe and Koss*. Reconsideration and withdrawal of the rejection is respectfully requested.

### **Claims 38, 60, and 82**

Claims 38, 60, and 82 are independent claims that include all the same features as Claim 16. Claim 38 is a computer-readable medium form of Claim 16, and Claims 60 and 82 are apparatus claims containing the subject matter Claim 16. Therefore, Claims 38, 60, and 82 are patentable under 35 U.S.C. § 103(a) over the combination of *Goringe* and *Koss* for at least all the same reasons as Claim 16. Reconsideration and withdrawal of the rejection is respectfully requested.

### **Dependent Claims**

Each of the dependent claims not yet mentioned is directly or indirectly dependent on one of independent Claims 16, 38, 60, or 82 and includes the same distinguishing features as its corresponding independent claim. Thus, all the dependent claims are patentable over *Goringe*

and *Koss* for at least the same reasons as for the independent claims given above. Therefore, each of the dependent claims is patentable under 35 U.S.C. §103(a) over the combination of *Goringe* and *Koss*. Reconsideration and withdrawal of the rejection is respectfully requested.

In addition, each of the dependent claims introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time.

B. CLAIM 17, 39, 61, AND 83 – *GORINGE, KOSS, AND CHISHOLM*

Claims 17, 39, 61, and 83 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over the combination of *Goringe, Koss, and Chisholm* U.S. Pat. No. 6,697,970. The rejection is respectfully traversed.

Claim 17 depends upon the independent Claim 16. Therefore, Claim 17 includes each and every feature of the independent base claim that is patentable over *Goringe and Koss* for the reasons explained above. *Chisholm* does not, nor is it alleged to, disclose the features of Claim 16 missing in *Goringe and Koss* as argued above. Therefore, Claim 17 is patentable over the combination of *Goringe, Koss and Chisholm*.

In addition, Claim 17 introduces one or more additional features that independently render the claim patentable. However, due to the fundamental differences already identified, and to expedite the positive resolution of this case, a separate discussion of those features is not included at this time. Reconsideration is respectfully requested.

C. CLAIMS 20, 42, 64 and 86 – *GORINGE, KOSS AND KWAN*

Claims 20, 42, 64 and 86 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Goringe and Koss* in view of *WhitePaper: IronShield Best Practices Hardening Foundry Routers & Switches to “Kwan.”* The rejection is respectfully traversed.

Claims 20, 42, 64, and 86 are dependent on claims 16, 38, 60, and 82 respectively. Therefore, each of Claims 20, 42, 64, and 86 includes the same distinguishing features as their corresponding independent claims that were already shown to be patentable over *Goringe and Koss*. *Kwan* does not, nor is it alleged to, disclose the distinguishing features of Claims 16, 38, 60, and 82 that are missing from *Goringe and Koss* as argued above. Therefore, Claims 20, 42, 64, and 86 are patentable over the combination of *Goringe, Koss, and Kwan*.

In addition, each of Claims 20, 42, 64, and 86 introduces one or more additional features that independently render the claim patentable. However, due to the fundamental differences already identified, and to expedite the positive resolution of this case, a separate discussion of those features is not included at this time. Reconsideration is respectfully requested.

III. CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time under 37 CFR 1.136 is hereby made to the extent necessary to make this reply timely filed. Please charge any applicable fee that is missing or insufficient to Deposit Account No. 50-1302.

Respectfully submitted,

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